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**Opposition Date: April 26, 2022**  
**Reply Date: May 26, 2022**

*Attorneys for the Defendants in Adversary Proceeding No. 11-02569 (CGM)*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

BARCLAYS BANK (SUISSE) S.A.,  
CAIXABANK S.A., as successor by merger to  
Barclays Bank S.A., and ZEDRA TRUST  
COMPANY (JERSEY) LIMITED (f/k/a Barclays  
Private Bank & Trust Limited),

Defendants.

Adv. Pro. No. 11-02569 (CGM)

**DECLARATION OF MARC J.  
GOTTRIDGE IN SUPPORT OF  
THE BARCLAYS DEFENDANTS'  
MOTION TO DISMISS THE  
COMPLAINT**

I, Marc J. Gottridge, hereby declare under penalty of perjury as follows:

1. I am a member of the bar of this Court, an attorney duly licensed and admitted to practice law in the State of New York, and a partner in Herbert Smith Freehills New York LLP, counsel for Defendants Barclays Bank (Suisse) S.A. (“Barclays Suisse”), Caixabank S.A., as successor by merger to Barclays Bank S.A. (“Barclays Spain”), and Zedra Trust Company (Jersey) Limited (f/k/a Barclays Private Bank & Trust Limited) (“Barclays Private Bank”) (together, the “Barclays Defendants”). I respectfully submit this declaration in support of the Barclays Defendants’ motion to dismiss the Complaint, as amended (the “Complaint”), filed by Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (the “Trustee”), in this adversary proceeding (the “Motion”).

2. The purposes of this declaration are to: (a) place before the Court certain documents attached to this declaration, which are referred to in the Barclays Defendants’ accompanying memorandum of law in support of the Motion (the “Memorandum”); (b) provide detailed calculations of the amounts sought by the Trustee in certain adversary proceedings filed in this Court as reflected in the Trustee’s various filings; and (c) request that the Court take judicial notice, pursuant to Rule 201(c)(2) of the Federal Rules of Evidence, of certain matters and facts.

**The Attached Exhibits**

3. Attached hereto as **Exhibit 1** is a true and correct copy of the Complaint (ECF No. 1) filed in this adversary proceeding, with all exhibits thereto.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the Stipulation and Order Amending Complaint and Substituting a Defendant entered in this adversary proceeding on December 15, 2021 (ECF No. 119).

5. Attached hereto as **Exhibit 3** is a true and correct copy of the Stipulation and Order Dismissing with Prejudice Certain Transfers Alleged in the Complaint entered in this adversary proceeding on February 14, 2022 (ECF No. 122).

6. Attached hereto as **Exhibit 4** is a true and correct copy of the First Amended Complaint filed by the Trustee in the matter captioned *Picard v. Fairfield Sentry Ltd.*, Adv. Pro. 09-01239 (Bankr. S.D.N.Y.) (the “Fairfield Action”), ECF No. 23, without exhibits.

7. Collectively attached hereto as **Exhibit 5** are true and correct copies of the three Consent Judgments entered in favor of the Trustee and against Fairfield Sentry Limited (“Fairfield Sentry”), Fairfield Sigma Limited (“Fairfield Sigma”), and Fairfield Lambda Limited (“Fairfield Lambda”) (together, the “Fairfield Funds”), filed in the Fairfield Action, ECF Nos. 108, 109, and 110.

8. Attached hereto as **Exhibit 6** is a true and correct copy of the Settlement Agreement dated as of May 9, 2011 between the Trustee and Kenneth Krys and Joanna Lau, as Joint Liquidators of the Fairfield Funds (the “Fairfield Settlement Agreement”), filed in the Fairfield Action, ECF No. 69-2, without exhibits.

9. Attached hereto as **Exhibit 7** is a true and correct copy of the Trustee’s Twenty-Sixth Interim Report for the Period April 1, 2021 through September 30, 2021 filed in the substantively consolidated SIPA liquidation proceeding captioned *Securities Investor Protection Corp. v. Bernard L. Madoff Investment Securities LLC*, Adv. Pro. No. 08-01789 (Bankr. S.D.N.Y.) (the “Consolidated Proceeding”), ECF No. 20821, with exhibits thereto.

10. Attached hereto as **Exhibit 8** is a true and correct copy of the Second Amended Complaint (the “Fairfield Second Amended Complaint”) filed in the Fairfield Action, ECF No. 286.

11. Collectively attached hereto as **Exhibit 9** are true and correct copies of Exhibits 8, 10, 12, 13, 14 and 21 to the Fairfield Second Amended Complaint filed in the Fairfield Action, ECF Nos. 286-8, 286-10, 286-12, 286-13, 286-14, and 286-21.

12. Attached hereto as **Exhibit 10** is a true and correct copy of Exhibit G to the Fairfield Settlement Agreement filed in the Fairfield Action, ECF No. 69-9.

13. Attached hereto as **Exhibit 11** is a true and correct copy of Fairfield Sentry's Memorandum of Association and Articles of Association, filed as an exhibit to the Declaration of William Hare, counsel for the Liquidators of the Fairfield Funds, in the matter captioned *Fairfield Sentry Ltd. v. Barclays Bank (Suisse) SA*, Adv. Pro. No. 11-01259 (Bankr. S.D.N.Y. Oct. 25, 2016), ECF No. 16-6.

14. Attached hereto as **Exhibit 12** is a true and correct copy of an Order Granting Authority to Issue Subpoenas for the Production of Documents and the Examination of Witnesses issued by the Court in the Consolidated Proceeding, ECF No. 31.

15. Collectively attached hereto as **Exhibit 13** are true and correct copies of Subpoenas for Rule 2004 Examination issued by the Trustee to Barclays Bank PLC and Barclays Capital Inc. on April 30, 2009, July 27, 2009, and April 8, 2010, in connection with the Consolidated Proceeding.

16. Attached hereto as **Exhibit 14** is a true and correct copy of the Declaration of Regina Griffin in Support of the Trustee's Omnibus Motion for Leave to Replead Pursuant to Fed. R. Civ. P. 15(a) and Court Order Authorizing Limited Discovery Pursuant to Fed. R. Civ. P. 26(d)(1), filed in this adversary proceeding (ECF No. 51), with exhibits thereto.

17. Collectively attached hereto as **Exhibit 15** are true and correct copies of the following documents:

(a)	Exhibit C to the Amended Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Citibank N.A. et al.</i> , Adv. Pro. No. 10-05345 (Bankr. S.D.N.Y.), ECF No. 214-3
(b)	Excerpts from the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Merrill Lynch International</i> , Adv. Pro. No. 10-05346 (Bankr. S.D.N.Y.), ECF No. 1-1, page 43
(c)	Exhibit D to the Amended Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Nomura International PLC</i> , Adv. Pro. No. 10-05348 (Bankr. S.D.N.Y.), ECF No. 42-4
(d)	Excerpts from the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banco Bilbao Vizcaya Argentaria, S.A.</i> , Adv. Pro. No. 10-05351 (Bankr. S.D.N.Y.), ECF No. 1-1, page 44
(e)	Excerpts from the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Pictet at Cie</i> , Adv. Pro. No. 11-01724 (Bankr. S.D.N.Y.), ECF No. 1, page 24
(f)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Safra National Bank of New York</i> , Adv. Pro. No. 11-01885 (Bankr. S.D.N.Y.), ECF No. 1-3
(g)	Exhibit K to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque SYZ &amp; Co., S.A.</i> , Adv. Pro. No. 11-02149 (Bankr. S.D.N.Y.), ECF No. 1-11
(h)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Abu Dhabi Investment Authority</i> , Adv. Pro. No. 11-02493 (Bankr. S.D.N.Y.), ECF No. 1-5
(i)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Orbita Capital Return Strategy Limited</i> , Adv. Pro. No. 11-02537 (Bankr. S.D.N.Y.), ECF No. 1-3
(j)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Quilvest Finance Ltd.</i> , Adv. Pro. No. 11-02538 (Bankr. S.D.N.Y.), ECF No. 1-4
(k)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Meritz Fire &amp; Marine Insurance Co. Ltd.</i> , Adv. Pro. No. 11-02539 (Bankr. S.D.N.Y.), ECF No. 1-3
(l)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Lion Global Investors Limited</i> , Adv. Pro. No. 11-02540 (Bankr. S.D.N.Y.), ECF No. 1-4
(m)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. First Gulf Bank</i> , Adv. Pro. No. 11-02541 (Bankr. S.D.N.Y.), ECF No. 1-4

(n)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Parson Finance Panama S.A.</i> , Adv. Pro. No. 11-02542 (Bankr. S.D.N.Y.), ECF No. 1-3
(o)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Delta National Bank and Trust Company</i> , Adv. Pro. No. 11-02551 (Bankr. S.D.N.Y.), ECF No. 1-4
(p)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Unifortune Asset Management SGR SPA et ano.</i> , Adv. Pro. No. 11-02553 (Bankr. S.D.N.Y.), ECF No. 1-3
(q)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. National Bank of Kuwait S.A.K.</i> , Adv. Pro. No. 11-02554 (Bankr. S.D.N.Y.), ECF No. 1-4
(r)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Cathay Life Insurance Co. LTD</i> , Adv. Pro. No. 11-02568 (Bankr. S.D.N.Y.), ECF No. 1-4
(s)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Cathay Life Insurance Co. LTD</i> , Adv. Pro. No. 11-02568 (Bankr. S.D.N.Y.), ECF No. 1-5
(t)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Barclays Bank (Suisse) S.A. et al.</i> , Adv. Pro. No. 11-02569 (Bankr. S.D.N.Y.), ECF No. 1-4
(u)	Exhibit G to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Barclays Bank (Suisse) S.A. et al.</i> , Adv. Pro. No. 11-02569 (Bankr. S.D.N.Y.), ECF No. 1-7
(v)	Exhibit I to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Barclays Bank (Suisse) S.A. et al.</i> , Adv. Pro. No. 11-02569 (Bankr. S.D.N.Y.), ECF No. 1-9
(w)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banca Carige S.P.A.</i> , Adv. Pro. No. 11-02570 (Bankr. S.D.N.Y.), ECF No. 1-3
(x)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Privee Espirito Santo S.A. formerly known as Compagnie Bancaire Espirito Santo S.A.</i> , Adv. Pro. No. 11-02571 (Bankr. S.D.N.Y.), ECF No. 1-4
(y)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Korea Exchange Bank, Individually and as Trustee for Korea Global All Asset Trust I-I, and for Tams Rainbow Trust III</i> , Adv. Pro. No. 11-02572 (Bankr. S.D.N.Y.), ECF No. 1-3
(z)	Exhibit D to the Amended Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. The Sumitomo Trust and Banking Co., Ltd.</i> , Adv. Pro. No. 11-02573 (Bankr. S.D.N.Y.), ECF No. 8-4

(aa)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. ASB Bank Corp.</i> , Adv. Pro. No. 11-02730 (Bankr. S.D.N.Y.), ECF No. 1-4
(bb)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Trincaster Corporation</i> , Adv. Pro. No. 11-02731 (Bankr. S.D.N.Y.), ECF No. 1-3
(cc)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bureau of Labor Insurance</i> , Adv. Pro. No. 11-02732 (Bankr. S.D.N.Y.), ECF No. 1-3
(dd)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Naidot &amp; Co.</i> , Adv. Pro. No. 11-02733 (Bankr. S.D.N.Y.), ECF No. 1-3
(ee)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Caceis Bank, Caceis Bank Luxembourg</i> , Adv. Pro. No. 11-02758 (Bankr. S.D.N.Y.), ECF No. 1-4
(ff)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. ABN AMRO Bank N.V. (now known as The Royal Bank of Scotland, N.V.)</i> , Adv. Pro. No. 11-02760 (Bankr. S.D.N.Y.), ECF No. 1-3
(gg)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Lighthouse Investment Partners LLC, doing business as Lighthouse Partners</i> , Adv. Pro. No. 11-02762 (Bankr. S.D.N.Y.), ECF No. 1-4
(hh)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Lighthouse Investment Partners LLC, doing business as Lighthouse Partners</i> , Adv. Pro. No. 11-02762 (Bankr. S.D.N.Y.), ECF No. 1-5
(ii)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Inteligo Bank LTD. Panama Branch, formerly known as Blubank LTD. Panama Branch</i> , Adv. Pro. No. 11-02763 (Bankr. S.D.N.Y.), ECF No. 1-4
(jj)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Somers Dublin Limited et al.</i> , Adv. Pro. No. 11-02784 (Bankr. S.D.N.Y.), ECF No. 1-3
(kk)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Merrill Lynch Bank (Suisse) SA</i> , Adv. Pro. No. 11-02910 (Bankr. S.D.N.Y.), ECF No. 1-3
(ll)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bank Julius Baer &amp; Co. Ltd.</i> , Adv. Pro. No. 11-02922 (Bankr. S.D.N.Y.), ECF No. 1-3
(mm)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Falcon Private Bank Ltd. (formerly known as AIG Privat Bank AG)</i> , Adv. Pro. No. 11-02923 (Bankr. S.D.N.Y.), ECF No. 1-3

(nn)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Credit Suisse AG et al.</i> , Adv. Pro. No. 11-02925 (Bankr. S.D.N.Y.), ECF No. 1-5
(oo)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. LGT Bank in Liechtenstein Ltd.</i> , Adv. Pro. No. 11-02929 (Bankr. S.D.N.Y.), ECF No. 1-3
(pp)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. The Public Institution for Social Security.</i> , Adv. Pro. No. 12-01002 (Bankr. S.D.N.Y.), ECF No. 1-3
(qq)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Fullerton Capital PTE Ltd.</i> , Adv. Pro. No. 12-01004 (Bankr. S.D.N.Y.), ECF No. 1-3
(rr)	Exhibit F to the Amended Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. SICO Limited</i> , Adv. Pro. No. 12-01005 (Bankr. S.D.N.Y.), ECF No. 14-6
(ss)	Exhibit F to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banco Itau Europa Luxembourg S.A. et ano.</i> , Adv. Pro. No. 12-01019 (Bankr. S.D.N.Y.), ECF No. 1-6
(tt)	Exhibit G to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banco Itau Europa Luxembourg S.A. et ano.</i> , Adv. Pro. No. 12-01019 (Bankr. S.D.N.Y.), ECF No. 1-7
(uu)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Grosvenor Investment Management Ltd. et al.</i> , Adv. Pro. No. 12-01021 (Bankr. S.D.N.Y.), ECF No. 1-3
(vv)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Grosvenor Investment Management Ltd. et al.</i> , Adv. Pro. No. 12-01021 (Bankr. S.D.N.Y.), ECF No. 1-4
(ww)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Grosvenor Investment Management Ltd. et al.</i> , Adv. Pro. No. 12-01021 (Bankr. S.D.N.Y.), ECF No. 1-5
(xx)	Exhibit J to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Credit Agricole (Suisse) S.A. et al.</i> , Adv. Pro. No. 12-01022 (Bankr. S.D.N.Y.), ECF No. 1-10
(yy)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Arden Asset Management Inc. et al.</i> , Adv. Pro. No. 12-01023 (Bankr. S.D.N.Y.), ECF No. 1-3
(zz)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. SNS Bank N.V. et ano.</i> , Adv. Pro. No. 12-01046 (Bankr. S.D.N.Y.), ECF No. 1-3



(aaa)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Koch Industries, Inc., as successor in interest to Koch Investment (UK) Company</i> , Adv. Pro. No. 12-01047 (Bankr. S.D.N.Y.), ECF No. 1-3
(bbb)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banco General S.A. et ano.</i> , Adv. Pro. No. 12-01048 (Bankr. S.D.N.Y.), ECF No. 1-3
(ccc)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Kookmin Bank</i> , Adv. Pro. No. 12-01194 (Bankr. S.D.N.Y.), ECF No. 1-3
(ddd)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Six Sis AG</i> , Adv. Pro. No. 12-01195 (Bankr. S.D.N.Y.), ECF No. 1-3
(eee)	Exhibit I to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bank Vontobel AG formerly known as Bank J. Vontobel &amp; Co. AG</i> , Adv. Pro. No. 12-01202 (Bankr. S.D.N.Y.), ECF No. 1-9
(fff)	Exhibit F to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Multi-Strategy Fund Limited et ano.</i> , Adv. Pro. No. 12-01205 (Bankr. S.D.N.Y.), ECF No. 1-6
(ggg)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Lloyds TSB Bank PLC</i> , Adv. Pro. No. 12-01207 (Bankr. S.D.N.Y.), ECF No. 1-3
(hhh)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BSI AG, individually and as successor in interest to Banco Del Gottardo</i> , Adv. Pro. No. 12-01209 (Bankr. S.D.N.Y.), ECF No. 1-3
(iii)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BSI AG, individually and as successor in interest to Banco Del Gottardo</i> , Adv. Pro. No. 12-01209 (Bankr. S.D.N.Y.), ECF No. 1-4
(jjj)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Schroder &amp; Co. Bank AG</i> , Adv. Pro. No. 12-01210 (Bankr. S.D.N.Y.), ECF No. 1-14
(kkk)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Union Securities Investment Trust Co., Ltd. et al.</i> , Adv. Pro. No. 12-01211 (Bankr. S.D.N.Y.), ECF No. 1-3
(lll)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Union Securities Investment Trust Co., Ltd. et al.</i> , Adv. Pro. No. 12-01211 (Bankr. S.D.N.Y.), ECF No. 1-4

(mmm)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Union Securities Investment Trust Co., Ltd. et al.</i> , Adv. Pro. No. 12-01211 (Bankr. S.D.N.Y.), ECF No. 1-5
(nnn)	Exhibit F to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bank Hapoalim (Switzerland) Ltd. et al.</i> , Adv. Pro. No. 12-01216 (Bankr. S.D.N.Y.), ECF No. 1-6
(ooo)	Exhibit G to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bank Hapoalim (Switzerland) Ltd. et al.</i> , Adv. Pro. No. 12-01216 (Bankr. S.D.N.Y.), ECF No. 1-7
(ppp)	Exhibit F to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. ZCM Asset Holding Company (Bermuda) LLC</i> , Adv. Pro. No. 12-01512 (Bankr. S.D.N.Y.), ECF No. 1-6
(qqq)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Citivic Nominees Ltd.</i> , Adv. Pro. No. 12-01513 (Bankr. S.D.N.Y.), ECF No. 1-3
(rrr)	Exhibit F to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Standard Chartered Defendants</i> , Adv. Pro. No. 12-01565 (Bankr. S.D.N.Y.), ECF No. 1-6
(sss)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. UKFP (Asia) Nominees Limited</i> , Adv. Pro. No. 12-01566 (Bankr. S.D.N.Y.), ECF No. 1-2
(ttt)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. BNP Paribas S.A.</i> , Adv. Pro. No. 12-01576 (Bankr. S.D.N.Y.), ECF No. 1-3
(uuu)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. UBS Deutschland AG as successor in interest to Dresdner Bank LateinAmerika AG et ano.</i> , Adv. Pro. No. 12-01577 (Bankr. S.D.N.Y.), ECF No. 1-3
(vvv)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. UBS Deutschland AG as successor in interest to Dresdner Bank LateinAmerika AG et ano.</i> , Adv. Pro. No. 12-01577 (Bankr. S.D.N.Y.), ECF No. 1-4
(www)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Barfield Nominees Limited</i> , Adv. Pro. No. 12-01669 (Bankr. S.D.N.Y.), ECF No. 1-9
(xxx)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Credit Agricole Corporate and Investment Bank doing business as Credit Agricole Private Banking Miami, formerly known as Calyon S.A. doing business as Credit Agricole Miami Private Bank, Successor in Interest to Credit Lyonnais S.A.</i> , Adv. Pro. No. 12-01670 (Bankr. S.D.N.Y.), ECF No. 1-9

(yyy)	Exhibit E to the Amended Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Credit Suisse AG, as successor in interest to Clariden Leu AG and Bank Leu AG</i> , Adv. Pro. No. 12-01676 (Bankr. S.D.N.Y.), ECF No. 12-5
(zzz)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Societe Generale Private Banking (Suisse) S.A. formerly known as SG Private Banking Suisse S.A. et al.</i> , Adv. Pro. No. 12-01677 (Bankr. S.D.N.Y.), ECF No. 1-5
(aaaa)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Intesa Sanpaolo SpA (as Successor in Interest to Banca Intesa SpA) et al.</i> , Adv. Pro. No. 12-01680 (Bankr. S.D.N.Y.), ECF No. 1-3
(bbbb)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Intesa Sanpaolo SpA (as Successor in Interest to Banca Intesa SpA) et al.</i> , Adv. Pro. No. 12-01680 (Bankr. S.D.N.Y.), ECF No. 1-4
(cccc)	Exhibit G to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. EFG Bank S.A., formerly known as EFG Private Bank S.A. et al.</i> , Adv. Pro. No. 12-01690 (Bankr. S.D.N.Y.), ECF No. 1-7
(dddd)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Degroof SA/NV also known as Banque Degroof Bruxelles et al.</i> , Adv. Pro. No. 12-01691 (Bankr. S.D.N.Y.), ECF No. 1-3
(eeee)	Exhibit D to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Degroof SA/NV also known as Banque Degroof Bruxelles et al.</i> , Adv. Pro. No. 12-01691 (Bankr. S.D.N.Y.), ECF No. 1-4
(ffff)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Lombard Odier &amp; Cie SA</i> , Adv. Pro. No. 12-01693 (Bankr. S.D.N.Y.), ECF No. 1-3
(gggg)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Cantonale Vaudoise</i> , Adv. Pro. No. 12-01694 (Bankr. S.D.N.Y.), ECF No. 1-3
(hhhh)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Bordier &amp; Cie</i> , Adv. Pro. No. 12-01695 (Bankr. S.D.N.Y.), ECF No. 1-3
(iiii)	Exhibit C to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. ABN AMRO Fund Services (Isle of Man) Nominees Limited, formerly known as Fortis (Isle Of Man) Nominees Limited et al.</i> , Adv. Pro. No. 12-01697 (Bankr. S.D.N.Y.), ECF No. 1-3

(jjjj)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Internationale a Luxembourg S.A. (formerly known as Dexia Banque Internationale a Luxembourg S.A.), individually and as successor in interest to Dexia Nordic Private Bank S.A. et al.</i> , Adv. Pro. No. 12-01698 (Bankr. S.D.N.Y.), ECF No. 1-5
(kkkk)	Exhibit E to the Complaint filed in the matter captioned <i>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Royal Bank of Canada et al.</i> , Adv. Pro. No. 12-01699 (Bankr. S.D.N.Y.), ECF No. 1-5

18. Collectively attached hereto as **Exhibit 16** are true and correct copies of Exhibits 5 and 6 to the Fairfield Second Amended Complaint filed in the Fairfield Action, ECF Nos. 286-5 and 286-6.

19. Attached hereto as **Exhibit 17** is a true and correct copy of the United Kingdom Privy Council’s judgment in *Fairfield Sentry Ltd. v. Migani*, [2014] UKPC 9, available at <https://www.jcpc.uk/cases/docs/jcpc-2012-0061-judgment.pdf>.

20. Collectively attached hereto as **Exhibit 18** are a certified English translation and a true and correct copy of a publicly-available French-language Extract without cancellations from the Geneva Register of Commerce, reflecting that Barclays Suisse was registered for “operation of a bank” on February 20, 1986.

21. Attached hereto as **Exhibit 19** is a true and correct copy of the Swiss Federal Banking Commission’s list of authorized banks and securities dealers dated December 26, 2008, identifying Barclays Suisse as a “[b]ank.”

22. Collectively attached hereto as **Exhibit 20** are excerpts from a certified English translation and a true and correct copy of a publicly-available Spanish-language 2007 list of companies registered as financial institutions from the Banco de España, reflecting that Caixabank (then named Barclays Bank S.A.) was registered as a bank with the Banco de España in 2007.

23. Collectively attached hereto as **Exhibit 21** are excerpts from a certified English translation and a true and correct copy of a publicly-available Spanish-language 2008 list of companies registered as financial institutions from the Banco de España, reflecting that Caixabank (then named as Barclays Bank S.A.) was registered as a bank with the Banco de España in 2008.

24. Collectively attached hereto as **Exhibit 22** are a certified English translation and a true and correct copy of publicly-available Spanish-language historical registry information from the Banco de España, reflecting that Caixabank (then named as Barclays Bank S.A.) was a financial institution between January 1, 2004 and December 31, 2008.

25. Attached hereto as **Exhibit 23** is a true and correct copy of the Jersey Financial Services Commission's ("JFSC") publicly-available registry entry for Zedra Trust Company (Jersey) Limited, reflecting that it was authorized to carry on "Trust Company Business."

26. Attached hereto as **Exhibit 24** is a true and correct copy of certain JFSC Companies Registry Records as of March 3, 2020, reflecting that the entity now known as Zedra Trust Company (Jersey) Limited has been registered with the JFSC since 1972.

27. Attached hereto as **Exhibit 25** is a true and correct copy of a JFSC Certificate of Incorporation: Change of Name of a Limited Company, reflecting that Barclays Trust Company (Jersey) Limited changed its name to Zedra Trust Company (Jersey) Limited on January 15, 2016.

28. Attached hereto as **Exhibit 26** is a true and correct copy of a JFSC Certificate of Incorporation: Change of Name of a Limited Company, reflecting that Barclays Private Bank & Trust Limited changed its name to Barclays Trust Company (Jersey) Limited on October 31, 2014.

**Calculations of Amounts Sought by the Trustee in Certain Adversary Proceedings**

29. Set forth below is a chart calculating the sum total of amounts claimed by the Trustee in adversary proceedings commenced in this Court as subsequent transfers allegedly received by the defendants listed below directly from Fairfield Sentry after May 9, 2003,<sup>1</sup> as reflected in the Trustee's complaints and/or exhibits thereto included in **Exhibit 15**:<sup>2</sup>

<b>ADV. PROC.</b>	<b>DEFENDANT(S)</b>	<b>AMOUNT</b>
10-05345	Citibank, N.A., et al	(\$100,000,000)
10-05346	Merrill Lynch International	(\$14,200,000)
10-05348	Nomura International PLC	(\$20,013,186)
10-05351	Banco Bilbao Vizcaya Argentaria, S.A.	(\$45,000,000)
11-01724	Pictet et Cie.	(\$50,386,685)
11-01885	Safra New York	(\$95,853,574)
11-02149	Banque Syz & Co., SA	(\$15,449,241)
11-02493	Abu Dhabi Investment Authority	(\$300,000,000)
11-02537	Orbita	(\$30,662,226)
11-02538	Quilvest Finance Ltd.	(\$37,800,113)
11-02539	Meritz Fire & Insurance Co. Ltd.	(\$21,855,898)
11-02540	Lion Global Investors Limited	(\$50,583,442)
11-02541	First Gulf Bank	(\$11,532,393)
11-02542	Parson Finance Panama S.A.	(\$11,089,081)

<sup>1</sup> According to Exhibit C to the Complaint in this adversary proceeding (Exhibit 1 hereto), May 9, 2003 is the date of the first alleged BLMIS-to-Fairfield Sentry initial transfer within the six-year lookback period (calculating back from the Filing Date of December 11, 2008).

<sup>2</sup> Where applicable, the numbers in this chart have been adjusted to reflect the dismissal of certain claims in the above-captioned adversary proceeding, *see supra* ¶ 4 (Exhibit 3 hereto), and in the adversary proceedings identified below, pursuant to the following: (i) Stipulation and Order entered on December 21, 2021, in the matter captioned *Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC v. The Public Institution for Social Security*, Adv. Pro. No. 12-01002 (Bankr. S.D.N.Y.), ECF No. 111; (ii) Stipulation and Order entered on January 27, 2022, in the matter captioned *Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC v. Banque Lombard Odier & Cie SA*, Adv. Pro. No. 12-01693 (Bankr. S.D.N.Y.), ECF No. 87; (iii) Stipulation and Order entered on February 22, 2022, in the matter captioned *Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC v. Schroder & Co. Bank AG*, Adv. Pro. No. 12-01210 (Bankr. S.D.N.Y.), ECF No. 89.

<b>ADV. PROC.</b>	<b>DEFENDANT(S)</b>	<b>AMOUNT</b>
11-02551	Delta National Bank and Trust Company	(\$20,634,958)
11-02553	Unifortune Asset Management SGR SpA, et al.	(\$16,355,650)
11-02554	National Bank of Kuwait S.A.K.	(\$18,724,399)
11-02568	Cathay Life Insurance Co. LTD.	(\$24,496,799)
11-02568	Cathay Bank	(\$17,206,126)
11-02569	Barclays Private Bank	(\$820,636)
11-02569	Barclays Spain	(\$4,719,252)
11-02569	Barclays Bank (Suisse) S.A. et al.	(\$37,973,175)
11-02570	Banca Carige S.P.A.	(\$10,532,489)
11-02571	BPES	(\$11,426,745)
11-02572	Korea Exchange Bank	(\$33,593,106)
11-02573	The Sumitomo Trust and Banking Co., Ltd.	(\$54,253,642)
11-02730	Atlantic Security Bank	(\$120,168,691)
11-02731	Trincaster Corporation	(\$13,311,800)
11-02732	Bureau of Labor Insurance	(\$42,123,406)
11-02733	Naidot & Co.	(\$13,654,907)
11-02758	Caceis Bank Luxembourg, et al.	(\$24,052,228)
11-02760	ABN Amro Bank N.V., et al.	(\$2,808,105)
11-02762	Lighthouse Diversified	(\$7,913,873)
11-02762	Lighthouse Supercash	(\$3,251,378)
11-02763	Inteligo Bank LTD.	(\$10,745,160)
11-02784	Somers Dublin Limited et al.	(\$1,985,648)
11-02910	Merrill Lynch Bank (Suisse) SA	(\$44,127,787)
11-02922	Bank Julius Baer & Co. Ltd.	(\$35,258,617)
11-02923	Falcon Private Bank Ltd.	(\$38,675,129)
11-02925	Credit Suisse AG et al.	(\$256,629,647)
11-02929	LGT Bank in Liechtenstein Ltd.	(\$10,350,118)
12-01002	The Public Institution For Social Security	(\$20,000,000)
12-01004	Fullerton Capital PTE Ltd.	(\$10,290,445)
12-01005	SICO LIMITED	(\$14,544,620)
12-01019	Banco Itau Europa Luxembourg S.A., et al.	(\$60,595,069)
12-01019	Banco Itau International	(\$9,969,942)
12-01021	Grosvenor Aggressive	(\$4,191,288)
12-01021	Grosvenor Balanced	(\$13,000,000)
12-01021	Grosvenor Private	(\$14,315,101)
12-01022	Credit Agricole (Suisse) SA	(\$15,654,127)
12-01023	Arden Asset Management, et al.	(\$12,586,659)
12-01046	SNS Bank N.V. et al.	(\$21,060,551)

<b>ADV. PROC.</b>	<b>DEFENDANT(S)</b>	<b>AMOUNT</b>
12-01047	KOCH INDUSTRIES, INC.,	(\$21,533,871)
12-01048	Banco General S.A. et al.	(\$8,240,499)
12-01194	Kookmin Bank	(\$42,010,303)
12-01195	Six Sis AG	(\$379,248)
12-01202	Bank Vontobel AG et. al.	(\$8,470,371)
12-01205	Multi Strategy Fund Ltd., et al.	(\$25,763,374)
12-01207	Lloyds TSB Bank PLC	(\$11,134,574)
12-01209	BSI AG	(\$27,452,138)
12-01209	Banca del Gottardo	(\$20,058,735)
12-01210	Schroder & Co.	(\$25,116,802)
12-01211	Union Securities Investment Trust Co., Ltd., et al.	(\$6,477,447)
12-01211	Union Global Fund	(\$9,283,664)
12-01211	Union Strategy Fund	(\$1,445,016)
12-01216	Bank Hapoalim Switzerland	(\$20,047,109)
12-01216	Bank Hapoalim B.M.	(\$1,712,100)
12-01512	ZCM Asset Holding Co (Bermuda) LLC	(\$24,491,791)
12-01513	CITIVIC	(\$59,479,232)
12-01565	Standard Chartered Financial Services (Luxembourg) SA, et al.	(\$275,267,978)
12-01566	UKFP (Asia) Nominees	(\$8,012,183)
12-01576	BNP Paribas S.A. et al	(\$3,423,188)
12-01577	UBS Deutschland AG, et al.	(\$7,230,511)
12-01577	LGT Switzerland	(\$522,826)
12-01669	Barfield Nominees Limited et al	(\$16,178,329)
12-01670	Credit Agricole Corporate and Investment Bank/BBH	(\$26,121,583)
12-01676	Clariden Leu AG	(\$35,838,401)
12-01677	Societe General Private Banking (Suisse) SA, et al.	(\$128,678,138)
12-01680	Intesa Sanpaolo SpA-Low Volatility	(\$7,913,079)
12-01680	Intesa Sanpaolo SpA-Medium Volatility	(\$3,740,436)
12-01690	EFG Bank S.A., et al.	(\$201,594,824)
12-01691	Banque Degroof Luxembourg	(\$1,303,203)
12-01691	Banque Degroof	(\$58,473)
12-01693	Banque Lombard Odier & Cie	(\$93,511,466)
12-01694	Banque Cantonale Vaudoise	(\$9,769,927)
12-01695	Bordier & Cie	(\$7,928,454)
12-01697	ABN AMRO Fund Services (Isle of Man) Nominees Limited, et al.	(\$122,001,935)
12-01698	Banque International a Luxembourg SA/Dexia	(\$61,515,524)



ADV. PROC.	DEFENDANT(S)	AMOUNT
12-01699	Royal Bank of Canada, et al.	(\$38,182,649)
	<b>Total Sentry Six-Year Transfers to Investors</b>	<b>(\$3,238,316,493)</b>
	Less Pre-May 9, 2003 transfers	\$66,839,526
	<b>Total Sentry Six-Year Transfers to Investors After First Potentially Avoidable Sentry Initial Transfer (May 9, 2003)</b>	<b>(\$3,171,476,967)</b>

30. Set forth below is a chart calculating the sum total of amounts claimed by the Trustee in the Fairfield Action as subsequent transfers allegedly received by the defendants listed below directly from Fairfield Sentry after May 9, 2003, as reflected in Exhibits 8, 10, 12, 13, 14, and 21 to the Fairfield Second Amended Complaint, collectively attached as **Exhibit 9** hereto:

EXHIBIT NO.	DEFENDANT(S)	AMOUNT
286-8	Fif Advanced Limited	(\$45,206,428)
286-10	Fairfield Investment Fund Limited	(\$337,718,887)
286-12	Fairfield Greenwich Limited	(\$87,440,586)
286-13	Fairfield Greenwich (Bermuda) Limited	(\$611,613,040)
286-14	Fairfield Greenwich Advisors	(\$56,013,598)
286-21	Amit Vijayvergiya	(\$955,465)
	<b>Total Sentry Six-Year Transfers to Investors</b>	<b>(\$1,138,948,004)</b>
	Less Pre-May 9, 2003 transfers	\$103,688,693
	<b>Total Sentry Six-Year Transfers to Investors After First Potentially Avoidable Sentry Initial Transfer (May 9, 2003)</b>	<b>(\$1,035,259,311)</b>

31. Set forth below is a chart reflecting the transfers made directly by Fairfield Sentry to the entities listed below between May 9, 2003, and September 30, 2003, as alleged in the complaints and/or exhibits thereto included in **Exhibits 15** and **16** hereto:

DEFENDANT	ADV. PRO. NO.	DATE	AMOUNT
Quilvest	11-02538	5/14/2003	(\$168,554)
Quilvest	11-02538	5/14/2003	(\$210,313)
Quilvest	11-02538	5/14/2003	(\$311,518)
Delta Bank	11-02551	5/14/2003	(\$73,217)

DEFENDANT	ADV. PRO. NO.	DATE	AMOUNT
Delta Bank	11-02551	5/14/2003	(\$100,952)
Delta Bank	11-02551	5/14/2003	(\$111,651)
Delta Bank	11-02551	5/14/2003	(\$696,496)
MLBS	11-02910	5/14/2003	(\$504,029)
MLBS	11-02910	5/14/2003	(\$1,500,000)
MLBS	11-02910	5/14/2003	(\$2,498,558)
BJB	11-02922	5/14/2003	(\$1,954,536)
Credit Suisse London Nominees Limited	11-02925	5/14/2003	(\$2,159,026)
Credit Suisse Nominees (Guernsey) Limited	11-02925	5/14/2003	(\$401,103)
Credit Suisse London Nominees Limited	11-02925	5/14/2003	(\$36,000)
LGT Liechtenstein	11-02929	5/14/2003	(\$500,974)
SNS Defendants	12-01046	5/14/2003	(\$641,531)
Lloyds	12-01207	5/14/2003	(\$2,093,660)
Lloyds	12-01207	5/14/2003	(\$247,494)
BSI	12-01209	5/14/2003	(\$191,989)
BSI	12-01209	5/14/2003	(\$238,192)
BSI	12-01209	5/14/2003	(\$266,369)
BSI	12-01209	5/14/2003	(\$621,629)
Banca Del Gottardo	12-01209	5/14/2003	(\$270,407)
Banca Del Gottardo	12-01209	5/14/2003	(\$1,401,608)
ZCM	12-01512	5/14/2003	(\$360,000)
Citivic	12-01513	5/14/2003	(\$103,656)
UKFP	12-01566	5/14/2003	(\$125,144)
Clariden	12-01676	5/14/2003	(\$84,331)
EFG Bank	12-01690	5/14/2003	(\$10,440,439)
EFG Bank	12-01690	5/14/2003	(\$5,803,800)
EFG Bank	12-01690	5/14/2003	(\$285,234)
EFG Bank	12-01690	5/14/2003	(\$279,420)
EFG Bank	12-01690	5/14/2003	(\$207,312)
EFG Bank	12-01690	5/14/2003	(\$170,077)
EFG Bank	12-01690	5/14/2003	(\$72,108)
Lombard Odier	12-01693	5/14/2003	(\$345,219)
Lombard Odier	12-01693	5/14/2003	(\$135,203)
Fairfield Lambda	09-1239	5/14/2003	(\$1,100,000)
Fairfield Sigma	09-1239	5/14/2003	(\$1,800,000)
ZCM	12-01512	5/19/2003	(\$1,300,000)
Credit Suisse, Nassau Branch LATAM Investment Banking	11-02925	5/20/2003	(\$93,029)
Naidot	11-02733	6/16/2003	(\$1,000,000)
MLBS	11-02910	6/16/2003	(\$25,000)
BJB	11-02922	6/16/2003	(\$300,287)
Credit Suisse London Nominees Limited	11-02925	6/16/2003	(\$100,000)
Credit Suisse AG, Nassau Branch	11-02925	6/16/2003	(\$71,259)

DEFENDANT	ADV. PRO. NO.	DATE	AMOUNT
Credit Suisse London Nominees Limited	11-02925	6/16/2003	(\$20,802)
Credit Suisse London Nominees Limited	11-02925	6/16/2003	(\$20,000)
LGT Liechtenstein	11-02929	6/16/2003	(\$72,797)
Agricole Suisse	12-01022	6/16/2003	(\$179,708)
SNS Defendants	12-01046	6/16/2003	(\$170,654)
Bank Vontobel	12-01202	6/16/2003	(\$227,490)
BSI	12-01209	6/16/2003	(\$113,745)
BSI	12-01209	6/16/2003	(\$180,190)
BSI	12-01209	6/16/2003	(\$255,335)
ZCM	12-01512	6/16/2003	(\$170,000)
Citivic	12-01513	6/16/2003	(\$496,838)
UKFP	12-01566	6/16/2003	(\$199,763)
UKFP	12-01566	6/16/2003	(\$46,180)
Bank Leu	12-01676	6/16/2003	(\$51,868)
Low Volatility	12-01680	6/16/2003	(\$1,000,000)
EFG Bank	12-01690	6/16/2003	(\$1,968,406)
EFG Bank	12-01690	6/16/2003	(\$655,000)
EFG Bank	12-01690	6/16/2003	(\$505,273)
EFG Bank	12-01690	6/16/2003	(\$382,274)
EFG Bank	12-01690	6/16/2003	(\$133,882)
EFG Bank	12-01690	6/16/2003	(\$120,169)
EFG Bank	12-01690	6/16/2003	(\$90,996)
EFG Bank	12-01690	6/16/2003	(\$82,688)
EFG Bank	12-01690	6/16/2003	(\$42,859)
EFG Bank	12-01690	6/16/2003	(\$38,983)
Bordier	12-01695	6/16/2003	(\$1,144,165)
ZCM	12-01512	6/18/2003	(\$750,000)
Quilvest	11-02538	7/16/2003	(\$54,186)
Quilvest	11-02538	7/16/2003	(\$2,471,566)
Delta Bank	11-02551	7/16/2003	(\$404,373)
Delta Bank	11-02551	7/16/2003	(\$2,493,614)
Inteligo	11-02763	7/16/2003	(\$2,336,175)
MLBS	11-02910	7/16/2003	(\$1,529,000)
BJB	11-02922	7/16/2003	(\$610,990)
Credit Suisse London Nominees Limited	11-02925	7/16/2003	(\$1,684,206)
Credit Suisse London Nominees Limited	11-02925	7/16/2003	(\$788,344)
Credit Suisse Nominees (Guernsey) Limited	11-02925	7/16/2003	(\$693,868)
Sico	12-01005	7/16/2003	(\$73,522)
Sico	12-01005	7/16/2003	(\$77,189)
Sico	12-01005	7/16/2003	(\$82,428)
Agricole Suisse	12-01022	7/16/2003	(\$186,572)
SNS Defendants	12-01046	7/16/2003	(\$2,215,212)
Lloyds	12-01207	7/16/2003	(\$336,843)

DEFENDANT	ADV. PRO. NO.	DATE	AMOUNT
BSI	12-01209	7/16/2003	(\$119,134)
BSI	12-01209	7/16/2003	(\$148,763)
BSI	12-01209	7/16/2003	(\$260,940)
UKFP	12-01566	7/16/2003	(\$302,756)
UKFP	12-01566	7/16/2003	(\$167,640)
UKFP	12-01566	7/16/2003	(\$100,735)
UKFP	12-01566	7/16/2003	(\$76,224)
UKFP	12-01566	7/16/2003	(\$74,625)
UKFP	12-01566	7/16/2003	(\$56,787)
UKFP	12-01566	7/16/2003	(\$47,293)
UKFP	12-01566	7/16/2003	(\$35,153)
SG Equilibrium	12-01677	7/16/2003	(\$32,270,698)
Lyxor Premium	12-01677	7/16/2003	(\$8,580,866)
SG Audace	12-01677	7/16/2003	(\$1,223,229)
SG Premium	12-01677	7/16/2003	(\$973,253)
EFG Bank	12-01690	7/16/2003	(\$1,594,867)
EFG Bank	12-01690	7/16/2003	(\$1,447,307)
EFG Bank	12-01690	7/16/2003	(\$476,480)
EFG Bank	12-01690	7/16/2003	(\$476,480)
EFG Bank	12-01690	7/16/2003	(\$266,886)
EFG Bank	12-01690	7/16/2003	(\$238,240)
EFG Bank	12-01690	7/16/2003	(\$51,015)
EFG Bank	12-01690	7/16/2003	(\$35,024)
Lombard Odier	12-01693	7/16/2003	(\$6,027,000)
Lombard Odier	12-01693	7/16/2003	(\$5,615,477)
Bordier	12-01695	7/16/2003	(\$1,497,385)
RBC-Dominion	12-01699	7/16/2003	(\$367,180)
Fairfield Lambda	09-1239	7/16/2003	(\$250,000)
Fairfield Sigma	09-1239	7/16/2003	(\$3,000,000)
Quilvest	11-02538	8/15/2003	(\$113,360)
Barclays Suisse	11-02569	8/15/2003	(\$26,317)
MLBS	11-02910	8/15/2003	(\$265,810)
MLBS	11-02910	8/15/2003	(\$300,750)
MLBS	11-02910	8/15/2003	(\$1,971,100)
MLBS	11-02910	8/15/2003	(\$6,386,104)
Credit Suisse (Luxembourg) SA	11-02925	8/15/2003	(\$1,000,000)
Credit Suisse London Nominees Limited	11-02925	8/15/2003	(\$708,540)
Credit Suisse London Nominees Limited	11-02925	8/15/2003	(\$154,873)
Credit Suisse AG, Nassau Branch	11-02925	8/15/2003	(\$149,727)
Credit Suisse London Nominees Limited	11-02925	8/15/2003	(\$93,224)
Credit Suisse London Nominees Limited	11-02925	8/15/2003	(\$56,410)
Sico	12-01005	8/15/2003	(\$32,628)
Sico	12-01005	8/15/2003	(\$237,721)

DEFENDANT	ADV. PRO. NO.	DATE	AMOUNT
Sico	12-01005	8/15/2003	(\$384,083)
BSI	12-01209	8/15/2003	(\$183,894)
BSI	12-01209	8/15/2003	(\$320,364)
ZCM	12-01512	8/15/2003	(\$130,000)
Citivic	12-01513	8/15/2003	(\$149,158)
Citivic	12-01513	8/15/2003	(\$24,238)
UKFP	12-01566	8/15/2003	(\$66,776)
Clariden	12-01676	8/15/2003	(\$63,113)
SG Suisse	12-01677	8/15/2003	(\$2,865,901)
EFG Bank	12-01690	8/15/2003	(\$150,000)
Lombard Odier	12-01693	8/15/2003	(\$1,598,288)
Lombard Odier	12-01693	8/15/2003	(\$1,584,808)
Bordier	12-01695	8/15/2003	(\$203,079)
RBC-Dominion	12-01699	8/15/2003	(\$88,507)
RBC-Jersey	12-01699	8/15/2003	(\$50,000)
Fairfield Lambda	09-1239	8/15/2003	(\$1,700,000)
Fairfield Sigma	09-1239	8/15/2003	(\$700,000)
Safra	11-01885	9/17/2003	(\$130,664)
Safra	11-01885	9/17/2003	(\$146,127)
Quilvest	11-02538	9/17/2003	(\$1,495,385)
Delta Bank	11-02551	9/17/2003	(\$140,353)
MLBS	11-02910	9/17/2003	(\$320,079)
MLBS	11-02910	9/17/2003	(\$964,543)
BJB	11-02922	9/17/2003	(\$18,686)
BJB	11-02922	9/17/2003	(\$1,595,815)
Credit Suisse London Nominees Limited	11-02925	9/17/2003	(\$1,992,900)
BSI	12-01209	9/17/2003	(\$14,015)
ZCM	12-01512	9/17/2003	(\$380,000)
Clariden	12-01676	9/17/2003	(\$750,000)
Clariden	12-01676	9/17/2003	(\$46,398)
Clariden	12-01676	9/17/2003	(\$35,000)
SG Suisse	12-01677	9/17/2003	(\$633,000)
Lombard Odier	12-01693	9/17/2003	(\$725,171)
Lombard Odier	12-01693	9/17/2003	(\$140,148)
Bordier	12-01695	9/17/2003	(\$3,272,168)
Bordier	12-01695	9/17/2003	(\$127,067)
Fairfield Lambda	09-1239	9/17/2003	(\$1,300,000)
Fairfield Lambda	09-1239	9/17/2003	(\$2,100,000)
Fairfield Sigma	09-1239	9/17/2003	(\$2,600,000)
Fairfield Sigma	09-1239	9/17/2003	(\$10,500,000)
<b>TOTAL</b>			<b>(\$183,527,206)</b>

**Request for Judicial Notice**

32. Pursuant to Federal Rule of Evidence 201(c)(2), the Barclays Defendants respectfully request that the Court take judicial notice of the documents attached hereto as Exhibits 4 through 16 and 18 through 26, inclusive, as well as other documents referred to in the Memorandum that were filed in the Fairfield Action or in certain adversary proceedings by the Fairfield Liquidators, for the purpose of considering those documents in adjudicating the Motion. The grounds for this request, including applicable precedents, are set forth in the Memorandum (*see* Memorandum at 4 n.2, 7 n.4, 18 n.16, 22 n.19, 24 n.21). The Barclays Defendants request that the Court take judicial notice of the fact of the filing of these documents and (where applicable) statements and admissions of the Trustee or the Fairfield Liquidators contained therein. The Barclays Defendants further request that the Court take judicial notice of the truth of the facts set forth in the public record materials attached as Exhibits 18 through 26, as those facts are “not subject to reasonable dispute” and “can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.” Fed. R. Evid. 201(b)(2).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 25, 2022, in New York, New York.

/s/ Marc J. Gottridge  
Marc J. Gottridge